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UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

ARTHUR LEE ALFRED, II, et al.,
Plaintiffs,
v.

WALT DISNEY PICTURES,,
Defendant.

Case No. 2:18-CV-08074-CBM-ASx

**DECLARATION OF BRANDON
J. PAKKEBIE**

Judge: Hon. Alka Sagar
*[referred by Hon. Consuelo B.
Marshall for discovery]*
Hearing Date: April 19, 2022
Time: 10:00 AM
Location: Courtroom 540

1
2 **DECLARATION OF BRANDON J. PAKKEBIER**

3 I, Brandon J. Pakkebier, declare:

4 1. I am one of the attorneys representing Plaintiffs Arthur Lee Alfred II
5 and Ezequiel Martinez, Jr. in this action. I have been admitted to practice before
6 this Court *pro hac vice* for this matter. I am also admitted to practice before all
7 courts in the State of Delaware and the State of Minnesota, as well as before the
8 United States District Court for the District of Delaware and for the District of
9 Minnesota. The facts stated herein are personally known to me and I could and
10 would testify competently thereto if called upon as a witness under oath.

11 2. Attached as **Exhibit 1** is a true and correct copy of correspondence
12 from Plaintiffs to Defendant Walt Disney Pictures (“Disney”) sent on February 25,
13 2022, requesting a meet and confer pursuant to Local Rule 37-1.

14 3. Attached as **Exhibit 2** is a true and correct copy of correspondence
15 Disney sent to Plaintiffs in reply on February 28, 2022.

16 4. Attached as **Exhibit 3** is a true and correct copy of the scheduling
17 order governing this action, as required by Local Rule 37-2.1

18 5. Exhibit 4 is intentionally omitted.

19 6. Attached as **Exhibit 5** is a true and correct copy of a screenshot of the
20 dictionary definition of “sequel” in the online *Oxford Learner’s Dictionary*.

21 7. Attached as **Exhibit 6** is a true and correct copy of an excerpted
22 transcript of the oral argument before the Hon. Consuelo B. Marshall on October
23 19, 2021 pertaining to Disney’s summary judgment motion.

1 I declare under the penalty of perjury under the laws of the United States of
2 America that the foregoing is true and correct.

3 Executed on the 15th of March 2022 in Minneapolis, Minnesota.

4
5 /s/ Brandon J. Pakkebie

6 Brandon J. Pakkebie